

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

IN RE:

CHERYL MORRIS,

Debtor, Petitioner

CASE No: 11-43415-A-7
Chapter 7

Docket No: CEM-1

**MOTION TO COMPEL
ABANDONMENT
DECEMBER 2, 2011**

11-43415-A-7

MOTION
DEBTOR: CHERYL MORRIS
JUDGE: HON. M. MCMAHUS

FILED 12/2/11 - 10:10 AM
CLERK, U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION mfrs

RECEIPT NO: 2-11-39654 \$176.00



NOTICE OF MOTION

THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS. IF NO TIMELY RESPONSE/OBJECTION IS FILED WITHIN TWENTY ONE (21) DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.

A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD.

In accordance with Notice required by the . Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rules 3007-1 and 9014-1, a Hearing has been set for December 19, 2011, at 10:00 a.m. in the Sacramento Division at 501 I Street, seventh floor, courtroom 28, Sacramento, California

Petitioner/Debtor filed for Bankruptcy, on September 30, 2011, in the U.S. District Court, Eastern District of California. The Debtor filed for protection under Chapter 7 of the Bankruptcy Code. David Gravell was appointed Chapter 7 Trustee. The proceedings in this case are currently moving.

Petitioner is duly notifying the Court that she is in possession of a business, situated at 3257 1/2 Folsom Blvd. Sacramento, California, 95816, located in a 900 square foot mixed-use

Motion to Compel Abandonment
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Cheryl Calhoun Morris
4450 El Centro Road, #417
Sacramento, CA 95835
916.479.6594

building. The business is a sole proprietorship and was established September, 2009. The business name is G Bella Salon, and is a small cosmetology establishment with no employees or contractors. The current value of the business is negligible, as there are presently no assets. The

business is of inconsequential value and benefit to the Estate or creditors. Nonetheless, the good will value of the business, were it to be sold, is \$500. The premises are rented and there has been no Real Property purchased in connection with the business.

MOTION

Petitioner in this Bankruptcy proceeding is requesting that the Court grant a Motion to Compel Abandonment, with regard to the business, G Bella Salon. The circumstances for said request is as follows:

- 1) The Court has Jurisdiction over the Motion
- 2) A mechanism in the Bankruptcy Code allows the Court to consider and to permit Abandonment;
- 3) It is appropriate that debtor declares Abandonment, pursuant to section 544;
- 4) There is no dispute that the business is of no value to the estate or creditors in this matter.

Petitioner sincerely appreciates the Court's consideration and does respectfully pray the Court will grant this Motion to Compel Abandonment. In that while the business has no monetary value, it serves a purpose in motivation, aspiration and pride for the Petitioner. Presently, Debtor strives to recalibrate and maintain a sense of dignity, while moving forward in life with a semblance of hope. The business aids in that hope. Additionally, appropriate paperwork has been filed with the California Secretary of State to establish the business as a

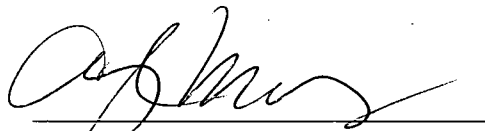
non-profit entity — a place for adolescent females who are survivors of abuse. The business serves as a meeting place for interested persons — such as victims, mentors and advocates.

DECLARATION

In an effort to convey transparency, Petitioner submits that there is a reasonable expectation of future prosperity; however, such success will be primarily derived from outside entrepreneurial ventures with minimal assets being generated from this business.

Finally, given what is at stake, this Petitioner falls upon the mercy of the Court and request that the Motion to Compel Abandonment be granted and that the Chapter 7 Trustee be directed to act accordingly.

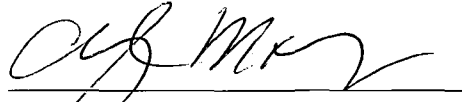
Dated this 2nd day of December, 2011


Cheryl Calhoun, *In Pro Per*

4800 Westlake Pkwy., #1602,
Sacramento, CA 95835
916.479.6594

CERTIFICATE OF SERVICE

In addition to the copies served electronically by the Court, I, Cheryl E. Morris, certify that on this 14th day of November 2011, a true and correct copy of the Motion to Compel Abandonment was served on the attached service list via first class United States mail, postage paid.


Cheryl Calhoun, *In Pro Per*

4800 Westlake Pkwy., #1602,
Sacramento, CA 95835
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SERVICE LIST

Motion to Compel Abandonment
Case No: 11-43415-A-7

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American Express
POB 981537
El Paso, TX 79998

Americas Service Co.
POB 10328
Des Moines, IA 50306

Arrow Financial Services
5996 W. Touhy Ave.
Niles, IL 60714

California Service Bureau
9 Commercial Blvd
Novato, CA 94949

Capital One Bank
POB 30281
Salk Lake City, UT 84130

Credit Bureau of Placer
209 Harding Blvd.
Roseville, CA 95678

Citi Bank
701 E. 60th St. N
Sioux Falls, SD 57104

Cit Bank
100 Technology Dr.
O'Fallon, MO 63368

Dish Network
8014 Bayberry Rd.
Jacksonville, FL 32256

Equable Ascent Financial
1120 W. Lake Cook Ste.
Buffalo Grove, IL 60089

Frontier/First Collection Services
301 Commerce St. Ste
Fort Worth, TX 76102

CBE Group
137 Tower Park Dr. Ste 100
Waterloo, IA 50701

Wells Fargo Home Mortgage
POB 10328
Des Moines, IA 50306

Safe Credit Union
3720 Madison Ave.
N. Highlands, CA 95660

TNB Target
POB 673
Minneapolis, MN 55440

Lane Bryant
POB 182789
Columbus, OH 43218

Allied Interstate Inc.
3000 Corporate Exchange Dr.
Columbus, OH 43231

Progressive Management Systems
1521 W. Cameron Ave. Fl 1
West Covina, CA 91790

LVNV Funding LLC
POB 10584
Greenville, SC 29603

Mortgage Lenders Network
146 New Britain Ave.
Plainville, CT 06062

NCO Financial
POB 15636
Wilmington, DE 19850

RJM Acquisitions LLC
575 Underhill Bld. Ste 224
Syosset, NY 11791

Commercial Trade Inc.
5330 Office Center
Bakersfield, CA 93309

Macys
POB 8218
Mason, OH 45040

GEMB/JCP
POB 981402
El Paso, TX 79998

HSBC Bank
POB 5253
Carol Stream, IL 60197

Household Finance/BNFL Finance
POB 3425
Buffalo, NY 14240

Integira Telecom
POB 2966
Milwaukee, WI 53201

CRS
1792 Tribute Rd. #400
Sacramento, CA 95815

American Coradius International
2420 Sweet Home Rd. Ste 50
Amherst, NY 14228

AT&T Mobility/Bay Area Credit
1901 W. 10th St.
Antioch, CA 94509

United Collections Bureau
5620 Southwick Blvd. #206
Toledo, OH 43614

Sutter General Hospital
POB 160100
Sacramento, CA 95816

Sutter Medical Foundation
POB 255228
Sacramento, CA 95865

U Store It
775 N. 16th St.
Sacramento, CA 95816

Michael & Associates
555 St. Cgarles dr. #204
Thousand Oaks, CA 91360

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